

EXHIBIT 5

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Declaration of Tom K. Wong

I, Tom K. Wong, declare as follows:

1. My name is Tom K. Wong and I am over eighteen years of age. I have personal knowledge of and could testify in Court concerning the following statements of fact.
2. I am an Associate Professor with tenure at the University of California, San Diego (UCSD). I work in the political science department, which is consistently ranked by U.S. News & World Report as one of the top ten political science departments nationally. I am also the Director of the International Migration Studies Program Minor at UCSD.
3. I am an expert on immigration politics and policy, which includes the Deferred Action for Childhood Arrivals (DACA) policy. I have written two peer-reviewed books and several peer-reviewed journal articles, book chapters, and reports on these subjects. My most recent book analyzes 31,193 roll call votes on immigration-related legislation in the U.S. Congress from 2005 to present, which makes it the most comprehensive analysis to date on the contemporary politics of immigration in the U.S. My most recent research on DACA is a national survey of 3,063 DACA recipients conducted in August 2017. This 2017 survey is in addition to two peer-reviewed journal articles on DACA (*International Migration Review* and *Journal on Migration and Human Security*), one book-length monograph (supported by a grant from the U.S. Department of Homeland Security [DHS]), and three other reports based on national surveys that I have conducted of DACA recipients.
4. I received a Ph.D. in political science at the end of the 2010-2011 academic year. I was

1 a post-doctoral research fellow during the 2011-2012 academic year. I joined the
 2 political science department at UCSD during the 2012-2013 academic year. I served as
 3 an advisor to the White House Initiative on Asian Americans and Pacific Islanders
 4 (WHIAAPI) during the 2015-2016 academic year, where I worked on the immigration
 5 portfolio.
 6

- 7 5. I have attached a true and complete copy of my curriculum vitae as Exhibit A to this
 8 Declaration.
 9

10 **DACA**

- 11 6. Since it was first announced on June 15, 2012, the Deferred Action for Childhood
 12 Arrivals policy has provided temporary relief from deportation as well as work
 13 authorization to 793,026 people.¹
 14

15 **2017 National Survey of DACA Recipients**

- 16
 17 7. From August 1, 2017 to August 20, 2017, I conducted a national online survey of
 18 DACA recipients. The resulting survey is the largest study to date of DACA recipients
 19 with a sample size of 3,063 respondents in forty-six states plus the District of
 20 Colombia.
 21
 22 8. Methodologically, several steps were taken to account for the known sources of bias
 23 that can result from online panels. To prevent ballot stuffing, meaning one person
 24

25 ¹ Based on the most recent publicly available data from U.S. Citizenship and Immigration Services
 26 (USCIS) at the time of this writing, which is up June 30, 2017. USCIS provides quarterly reports on DACA. See:
https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

1 submitting multiple responses, incentives were not given for each completed survey
 2 that was submitted. Moreover, a state-of-the-art online survey platform (Qualtrics),
 3 which can be programmed to prevent one IP address from submitting multiple
 4 responses, was used. To prevent spoiled ballots, meaning people who responded to the
 5 survey who are not undocumented, I used a unique validation test for undocumented
 6 status. Multiple questions were asked about each respondent's migratory history. These
 7 questions were asked during different parts of the survey. When a question was
 8 repeated, it was posed using different wording. For example, "How old were you when
 9 you first came to the U.S.?" and, "In what year did you first come to the U.S.?" (current
 10 age was used to tether these answers). If there was agreement in the answers, meaning
 11 there was consistency regarding the respondent's migratory history, the respondent was
 12 kept in the resulting sample. If there were inconsistencies, the respondent was
 13 excluded. Also, Facebook ads were used to improve the geographic representativeness
 14 of the resulting sample, as well as to recruit respondents who are outside of the
 15 networks of the organizations that conducted outreach for the survey. Because there is
 16 no directory of undocumented immigrants from which to randomly sample from,
 17 researchers need to partner with organizations that interact with undocumented
 18 immigrants to conduct such surveys. The outreach partners were United We Dream
 19 (UWD), the National Immigration Law Center (NILC), and the Center for American
 20 Progress (CAP). Given the nature of online opt-in surveys, it is not possible to construct
 21 a valid margin of error.

22
 23
 24
 25 9. Evaluating representativeness and reweighting the sample requires current and
 26

complete data on the characteristics of DACA recipients. The only publicly available data that is current and complete is their geographic breakdown at the state level. These data are made publicly available by USCIS. USCIS also provides publicly available data on the country of birth of DACA recipients but these data are incomplete.² Thus, a two-sample Kolmogorov-Smirnov test of equality of distributions shows that the state-by-state breakdown of the sample is representative of the state-by-state breakdown of all DACA recipients ($p = .570$).³

DACA Improves the Economic Integration of Recipients

10. DACA has been critical in improving the economic integration of DACA recipients.

11. Regarding employment, 91% of DACA recipients are currently employed. Among those 25 years and older, this percentage climbs to 93%.

12. Moreover, after receiving DACA:

- a. 54% got their first job;
- b. 69% got a job with better pay;
- c. 54% got a job that better fits their education and training;

² USCIS only lists the top twenty-five countries of birth, and one of these is “unknown.” USCIS has analyzed the demographic characteristics of DACA recipients, but this initial analysis was based on data on DACA approvals from August 2012 to September 2013. See: <https://www.uscis.gov/sites/default/files/USCIS/Humanitarian/Deferred%20Action%20for%20Childhood%20Arrivals/USCIS-DACA-Characteristics-Data-2014-7-10.pdf>. More recently, USCIS published updated characteristics. A Kolmogorov-Smirnov test of equality of distributions shows that the state-by-state breakdown of the sample is representative of the state-by-state breakdown of all “active DACA recipients” as of September 2017 ($p = .557$). Moreover, the most recent USCIS report indicates that the average age of active DACA recipients is 23.8. The average age of the sample is similar at 25.2. The most recent USCIS data do not provide detailed cross-tabulations sufficient for weighting purposes.

³ That is, there is no evidence to suggest that the distribution of survey respondents by state and the actual number of DACA recipients by state is statistically significantly different. Moreover, analyzing and comparing the unweighted and weighted results show that the findings are substantively similar throughout.

- d. 54% got a job that better fits their long-term career goals;
- e. 57% got a job with health insurance or other benefits;
- f. 56% got a job with improved work conditions; and
- g. 5% started their own businesses.

Table 1 summarizes these results. The column “ ≥ 25 ” reports the results for respondents 25 years and older.

			≥ 25
	Got my first job	54.2%	35.3%
	Got a job with better pay	68.5%	77.7%
	Got a job that better fits my education and training	54.2%	59.6%
	Got a job that better fits my long-term career goals	53.9%	61.4%
	Got a job with health insurance or other benefits	57.3%	66.9%
	Got a job with improved work conditions	56.2%	64.4%
	Started my own business	5.4%	7.9%

Note: percentages do not sum to 100 as individuals may select all that apply. $n = 1,662$ for all respondents 25 years and older.

13. Regarding earnings, the data make clear that DACA is having a positive and significant effect on wages.

14. The average hourly wage of DACA recipients has increased by 69% since receiving DACA. Among those 25 years and older, the average hourly wage has increased by 81%.

15. The data also show that average annual earnings among DACA recipients is \$36,232. Among those 25 years and older, it is \$41,621.

16. Higher wages have meant greater financial independence and consumer purchasing power. For example:

- a. 69% reported, “I have been able to earn more money, which has helped me

become financially independent”;

- b. 71% reported, “I have been able to earn more money, which has helped my family financially”;
- c. 65% purchased their first car after receiving DACA; and
- d. 16% purchased their first home after receiving DACA.

Table 2 summarizes these results. The column “≥ 25” reports the results for respondents 25 years and older.

			≥ 25
I have been able to earn more money, which has helped me			
become financially independent	69.0%	73.4%	
I have been able to earn more money, which has helped my			
family financially	70.8%	73.7%	
Bought my first car	64.5%	67.2%	
Bought a home	15.7%	23.5%	

Note: percentages do not sum to 100 as individuals may select all that apply. $n = 1,662$ for all respondents 25 years and older.

17. Higher wages are one indicator of the broader positive economic impact of DACA. For example, higher wages translate into more federal income taxes paid, more state income taxes paid, and more in Federal Insurance Contributions Act (FICA) contributions, which are mandatory payroll deductions for Social Security and Medicare. Moreover, large purchases such as cars add to state tax revenues, as most states collect a percentage of the car purchase in sales tax, along with additional registration and title fees. Similarly, home buying further adds to state and local tax revenues in the form of property taxes.⁴

⁴ There is a literature on how home buying creates new jobs and adds new spending in local economies. For job creation, see here: <https://www.nar.realtor/topics/home-ownership-matters/jobs-impact-of-an-existing->

DACA Improves the Education of Recipients

18. Overall, 45% of DACA recipients are currently in school. Among those who are currently in school, 94% reported, “I pursued educational opportunities that I previously could not” because of DACA.

19. Among those in school, 72% are pursuing a bachelor’s degree or higher. The majors and specializations that DACA recipients are pursuing include accounting, biochemistry, business administration, chemical engineering, civil engineering, computer science, early childhood education, economics, environmental science, history, law, mathematics, mechanical engineering, neuroscience, physics, psychology, and social work, to name a few.

20. Regarding educational attainment, 36% of respondents 25 years and older have a bachelor’s degree or higher.

21. The education DACA recipients are receiving not only means a better prepared and competitive workforce, but DACA recipients are also being recognized by many of the top companies in the country. The data show that at least 72% of the top twenty-five Fortune 500 companies employ DACA recipients.

DACA and Normality in Day-to-Day Life

22. The data also show that DACA has provided recipients a degree of normality in their day-to-day lives. For example, after receiving DACA:

[home-purchase](https://www.cnbc.com/2017/04/12/immigrant-households-impact-success-of-real-estate-market-says-report.html). For spending in local economies, see here: <https://www.cnbc.com/2017/04/12/immigrant-households-impact-success-of-real-estate-market-says-report.html>

- a. 61% opened a bank account;
- b. 66% got their first credit card;
- c. 80% got a driver's license for the first time;
- d. 55% got a state identification card for the first time; and
- e. 49% became organ donors.

Table 3 summarizes these results. The column " ≥ 25 " reports the results for respondents 25 years and older.

			≥ 25
	Opened a bank account	61.0%	47.3%
	Got my first credit card	65.7%	67.9%
	Got my driver's license for the first time	79.7%	80.4%
	Got a state identification card for the first time	55.1%	51.1%
	Became an organ donor	48.7%	49.8%

Note: percentages do not sum to 100 as individuals may select all that apply. $n = 1,662$ for all respondents 25 years and older.

DACA Recipients and American Citizen Family Members

23. A combined 73% of DACA recipients have either an American citizen sibling, spouse, or child:

- a. 59% have an American citizen sibling;
- b. 17% have an American citizen spouse; and
- c. 26% have an American citizen child.

Table 4 summarizes these results.

American citizen spouse	16.6%
American citizen child	25.7%
American citizen sibling	58.9%
American citizen spouse, child, or sibling	72.7%

Note: percentages do not sum to 100 as individuals may select all that apply.

Many Recipients May Go Back “Into the Shadows” if DACA Ends

24. The data show that should DACA end, recipients may go back “into the shadows.” For example, if DACA ended 53% reported that they would be less likely to report a crime they witnessed; 47% reported that they would be less likely to report a crime even if they were the victim; 48% reported that they would be less likely to go to the hospital if they suffered an injury; and 60% reported that they would be less likely to report wage theft by their employer.
25. Moreover, 22% reported being “likely” or “very likely” to leave the country if DACA ends.

DACA Recipients by State

26. Below are examples of state-specific profiles of DACA recipients. Data from the survey are used to construct these profiles.

DACA Recipients in the State of Colorado

27. As of June 30, 2017, there were 17,310 initial DACA approvals in the State of

Colorado.⁵

28. Regarding employment and earnings:

- a. An estimated 15,281 DACA recipients in the State of Colorado are currently employed⁶;
- b. An estimated 935 DACA recipients in the State of Colorado are business owners⁷; and
- c. The State of Colorado's DACA recipients earn an estimated \$627.2 million annually.⁸

29. Regarding education:

- a. An estimated 7,772 DACA recipients in the State of Colorado are currently in school⁹;
- b. Among those currently in school, an estimated 7,275 have "pursued educational opportunities that I previously could not" because of DACA¹⁰; and
- c. An estimated 5,557 DACA recipients in the State of Colorado are currently pursuing a bachelor's degree or higher.¹¹

30. Regarding American citizen family members:

- a. An estimated 12,584 DACA recipients in the State of Colorado have an

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https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

⁶ 91.4% of 17,310.

⁷ 5.4% of 17,310.

⁸ 15,821 multiplied by \$36,231.91. This translates into \$38.9 million annually in Social Security contributions (6.2% per FICA) and \$9.1 million annually in Medicare contributions (1.45% per FICA).

⁹ 44.9% of 17,310.

¹⁰ 93.6 % of 7,772.

¹¹ 71.5% of 7,772.

American citizen sibling, spouse, or child.¹²

DACA Recipients in the State of Connecticut

31. As of June 30, 2017, there were 4,989 initial DACA approvals in the State of Connecticut.¹³

32. Regarding employment and earnings:

- a. An estimated 4,560 DACA recipients in the State of Connecticut are currently employed¹⁴;
- b. An estimated 269 DACA recipients in the State of Connecticut are business owners¹⁵; and
- c. The State of Connecticut’s DACA recipients earn an estimated \$180.8 million annually.¹⁶

33. Regarding education:

- a. An estimated 2,240 DACA recipients in the State of Connecticut are currently in school¹⁷;
- b. Among those currently in school, an estimated 2,097 have “pursued educational opportunities that I previously could not” because of DACA¹⁸; and

¹² 72.7% of 17,310.

¹³ As a common rule, smaller sample sizes lead to greater uncertainty around estimates. https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

¹⁴ 91.4% of 4,989.

¹⁵ 5.4% of 4,989.

¹⁶ 4,560 multiplied by \$36,231.91. This translates into \$11.2 million annually in Social Security contributions (6.2% per FICA) and \$2.6 million annually in Medicare contributions (1.45% per FICA).

¹⁷ 44.9% of 4,989.

¹⁸ 93.6 % of 2,240.

- c. An estimated 1,602 DACA recipients in the State of Connecticut are currently pursuing a bachelor's degree or higher.¹⁹

34. Regarding American citizen family members:

- a. An estimated 3,627 DACA recipients in the State of Connecticut have an American citizen sibling, spouse, or child.²⁰

DACA Recipients in the State of Delaware

35. As of June 30, 2017, there were 1,451 initial DACA approvals in the State of Delaware.²¹

36. Regarding employment and earnings:

- a. An estimated 1,326 DACA recipients in the State of Delaware are currently employed²²; and
- b. The State of Delaware's DACA recipients earn an estimated \$52.6 million annually.²³

37. Regarding education:

- a. An estimated 651 DACA recipients in the State of Delaware are currently in school²⁴;
- b. Among those currently in school, an estimated 610 have "pursued educational

¹⁹ 71.5% of 2,240.

²⁰ 72.7% of 4,989.

²¹ As a common rule, smaller sample sizes lead to greater uncertainty around estimates.

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

²² 91.4% of 1,451.

²³ 1,326 multiplied by \$36,231.91. This translates into \$3.3 million annually in Social Security contributions (6.2% per FICA) and \$0.8 million annually in Medicare contributions (1.45% per FICA).

²⁴ 44.9% of 1,451.

opportunities that I previously could not” because of DACA²⁵; and

- c. An estimated 466 DACA recipients in the State of Delaware are currently pursuing a bachelor’s degree or higher.²⁶

38. Regarding American citizen family members:

- a. An estimated 1,055 DACA recipients in the State of Delaware have an American citizen sibling, spouse, or child.²⁷

DACA Recipients in the District of Columbia

39. As of June 30, 2017, there were 773 initial DACA approvals in the District of Columbia.²⁸

40. Regarding employment and earnings:

- a. An estimated 707 DACA recipients in the District of Columbia are currently employed²⁹; and
- b. The District of Columbia’s DACA recipients earn an estimated \$28.0 million annually.³⁰

41. Regarding education:

- a. An estimated 347 DACA recipients in the District of Columbia are currently in

²⁵ 93.6 % of 651.

²⁶ 71.5% of 651.

²⁷ 72.7% of 1,451.

²⁸ As a common rule, smaller sample sizes lead to greater uncertainty around estimates.

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

²⁹ 91.4% of 773.

³⁰ 707 multiplied by \$36,231.91. This translates into \$1.7 million annually in Social Security contributions (6.2% per FICA) and \$0.4 million annually in Medicare contributions (1.45% per FICA).

school³¹;

- b. Among those currently in school, an estimated 325 have “pursued educational opportunities that I previously could not” because of DACA³²; and
- c. An estimated 248 DACA recipients in the District of Columbia are currently pursuing a bachelor’s degree or higher.³³

42. Regarding American citizen family members:

- a. An estimated 562 DACA recipients in the District of Columbia have an American citizen sibling, spouse, or child.³⁴

DACA Recipients in the State of Hawaii

43. As of June 30, 2017, there were 582 initial DACA approvals in the State of Hawaii.³⁵

44. Regarding employment and earnings:

- a. An estimated 532 DACA recipients in the State of Hawaii are currently employed³⁶; and
- b. The State of Hawaii’s DACA recipients earn an estimated \$21.1 million annually.³⁷

45. Regarding education:

³¹ 44.9% of 773.

³² 93.6 % of 347.

³³ 71.5% of 347.

³⁴ 72.7% of 773.

³⁵ As a common rule, smaller sample sizes lead to greater uncertainty around estimates.

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

³⁶ 91.4% of 44.

³⁷ 40 multiplied by \$36,231.91. This translates into approximately \$99,900 annually in Social Security contributions (6.2% per FICA) and \$23,000 annually in Medicare contributions (1.45% per FICA).

- a. An estimated 261 DACA recipients in the State of Hawaii are currently in school³⁸;
- b. Among those currently in school, an estimated 245 have “pursued educational opportunities that I previously could not” because of DACA³⁹; and
- c. An estimated 187 DACA recipients in the State of Hawaii are currently pursuing a bachelor’s degree or higher.⁴⁰

46. Regarding American citizen family members:

- a. An estimated 423 DACA recipients in the State of Hawaii have an American citizen sibling, spouse, or child.⁴¹

DACA Recipients in the State of Illinois

47. As of June 30, 2017, there were 42,537 initial DACA approvals in the State of Illinois.⁴²

48. Regarding employment and earnings:

- a. An estimated 38,879 DACA recipients in the State of Illinois are currently employed⁴³;
- b. An estimated 2,297 DACA recipients in the State of Illinois are business owners⁴⁴; and

³⁸ 44.9% of 44.

³⁹ 93.6 % of 20.

⁴⁰ 71.5% of 20.

⁴¹ 72.7% of 44.

⁴²

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

⁴³ 91.4% of 42,537.

⁴⁴ 5.4% of 42,537.

c. The State of Illinois's DACA recipients earn an estimated \$1.5 billion annually.⁴⁵

49. Regarding education:

- a. An estimated 19,099 DACA recipients in the State of Illinois are currently in school⁴⁶;
- b. Among those currently in school, an estimated 17,877 have "pursued educational opportunities that I previously could not" because of DACA⁴⁷; and
- c. An estimated 13,656 DACA recipients in the State of Illinois are currently pursuing a bachelor's degree or higher.⁴⁸

50. Regarding American citizen family members:

- a. An estimated 30,924 DACA recipients in the State of Illinois have an American citizen sibling, spouse, or child.⁴⁹

DACA Recipients in the State of Iowa

51. As of June 30, 2017, there were 2,812 initial DACA approvals in the State of Iowa.⁵⁰

52. Regarding employment and earnings:

- a. An estimated 2,570 DACA recipients in the State of Iowa are currently

⁴⁵ 38,879 multiplied by \$36,231.91. This translates into \$95.6 million annually in Social Security contributions (6.2% per FICA) and \$22.3 million annually in Medicare contributions (1.45% per FICA).

⁴⁶ 44.9% of 42,537.

⁴⁷ 93.6 % of 19,099.

⁴⁸ 71.5% of 19,099.

⁴⁹ 72.7% of 42,537.

⁵⁰ As a common rule, smaller sample sizes lead to greater uncertainty around estimates.

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

employed⁵¹;

b. An estimated 152 DACA recipients in the State of Iowa are business owners⁵²;

and

c. The State of Iowa’s DACA recipients earn an estimated \$101.9 million annually.⁵³

53. Regarding education:

a. An estimated 1,263 DACA recipients in the State of Iowa are currently in school⁵⁴;

b. Among those currently in school, an estimated 1,182 have “pursued educational opportunities that I previously could not” because of DACA⁵⁵; and

c. An estimated 903 DACA recipients in the State of Iowa are currently pursuing a bachelor’s degree or higher.⁵⁶

54. Regarding American citizen family members:

a. An estimated 2,044 DACA recipients in the State of Iowa have an American citizen sibling, spouse, or child.⁵⁷

DACA Recipients in the State of Massachusetts

55. As of June 30, 2017, there were 8,053 initial DACA approvals in the State of

⁵¹ 91.4% of 2,812.

⁵² 5.4% of 2,812.

⁵³ 2,570 multiplied by \$36,231.91. This translates into \$6.3 million annually in Social Security contributions (6.2% per FICA) and \$1.5 million annually in Medicare contributions (1.45% per FICA).

⁵⁴ 44.9% of 2,812.

⁵⁵ 93.6 % of 1,263.

⁵⁶ 71.5% of 1,263.

⁵⁷ 72.7% of 2,812.

Massachusetts.⁵⁸

56. Regarding employment and earnings:

- a. An estimated 7,360 DACA recipients in the State of Massachusetts are currently employed⁵⁹;
- b. An estimated 435 DACA recipients in the State of Massachusetts are business owners⁶⁰; and
- c. The State of Massachusetts's DACA recipients earn an estimated \$291.8 million annually.⁶¹

57. Regarding education:

- a. An estimated 3,616 DACA recipients in the State of Massachusetts are currently in school⁶²;
- b. Among those currently in school, an estimated 3,384 have "pursued educational opportunities that I previously could not" because of DACA⁶³; and
- c. An estimated 2,585 DACA recipients in the State of Massachusetts are currently pursuing a bachelor's degree or higher.⁶⁴

58. Regarding American citizen family members:

- a. An estimated 5,855 DACA recipients in the State of Massachusetts have an

⁵⁸

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

⁵⁹ 91.4% of 8,053.

⁶⁰ 5.4% of 8,053.

⁶¹ 7,360 multiplied by \$36,231.91. This translates into \$18.1 million annually in Social Security contributions (6.2% per FICA) and \$4.2 million annually in Medicare contributions (1.45% per FICA).

⁶² 44.9% of 8,053.

⁶³ 93.6 % of 3,616.

⁶⁴ 71.5% of 3,616.

American citizen sibling, spouse, or child.⁶⁵

DACA Recipients in the State of New Mexico

59. As of June 30, 2017, there were 6,838 initial DACA approvals in the State of New Mexico.⁶⁶

60. Regarding employment and earnings:

- a. An estimated 6,250 DACA recipients in the State of New Mexico are currently employed⁶⁷;
- b. An estimated 369 DACA recipients in the State of New Mexico are business owners⁶⁸; and
- c. The State of New Mexico's DACA recipients earn an estimated \$247.8 million annually.⁶⁹

61. Regarding education:

- a. An estimated 3,070 DACA recipients in the State of New Mexico are currently in school⁷⁰;
- b. Among those currently in school, an estimated 2,874 have "pursued educational opportunities that I previously could not" because of DACA⁷¹; and

⁶⁵ 72.7% of 8,053.

⁶⁶

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

⁶⁷ 91.4% of 6,838.

⁶⁸ 5.4% of 6,838.

⁶⁹ 6,250 multiplied by \$36,231.91. This translates into \$15.4 million annually in Social Security contributions (6.2% per FICA) and \$3.6 million annually in Medicare contributions (1.45% per FICA).

⁷⁰ 44.9% of 6,838.

⁷¹ 93.6 % of 3,070.

- c. An estimated 2,195 DACA recipients in the State of New Mexico are currently pursuing a bachelor's degree or higher.⁷²

62. Regarding American citizen family members:

- a. An estimated 4,971 DACA recipients in the State of New Mexico have an American citizen sibling, spouse, or child.⁷³

DACA Recipients in the State of New York

63. As of June 30, 2017, there were 42,503 initial DACA approvals in the State of New York.⁷⁴

64. Regarding employment and earnings:

- a. An estimated 38,848 DACA recipients in the State of New York are currently employed⁷⁵;
- b. An estimated 2,295 DACA recipients in the State of New York are business owners⁷⁶; and
- c. The State of New York's DACA recipients earn an estimated \$1.5 billion annually.⁷⁷

65. Regarding education:

- a. An estimated 19,084 DACA recipients in the State of New York are currently in

⁷² 71.5% of 3,070.

⁷³ 72.7% of 6,838.

⁷⁴

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

⁷⁵ 91.4% of 42,503.

⁷⁶ 5.4% of 42,503.

⁷⁷ 38,848 multiplied by \$36,231.91. This translates into \$95.5 million annually in Social Security contributions (6.2% per FICA) and \$22.3 million annually in Medicare contributions (1.45% per FICA).

school⁷⁸;

- b. Among those currently in school, an estimated 17,862 have “pursued educational opportunities that I previously could not” because of DACA⁷⁹; and
- c. An estimated 13,645 are currently pursuing a bachelor’s degree or higher.⁸⁰

66. Regarding American citizen family members:

- a. An estimated 30,900 DACA recipients in the State of New York have an American citizen sibling, spouse, or child.⁸¹

DACA Recipients in the State of North Carolina

67. As of June 30, 2017, there were 27,455 initial DACA approvals in the State of North Carolina.⁸²

68. Regarding employment and earnings:

- a. An estimated 25,094 DACA recipients in the State of North Carolina are currently employed⁸³;
- b. An estimated 1,483 DACA recipients in the State of North Carolina are business owners⁸⁴; and
- c. The State of North Carolina’s DACA recipients earn an estimated \$994.7

⁷⁸ 44.9% of 42,503.

⁷⁹ 93.6 % of 19,084.

⁸⁰ 71.5% of 19,084.

⁸¹ 72.7% of 42,503.

⁸²

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

⁸³ 91.4% of 27,455.

⁸⁴ 5.4% of 27,455.

million annually.⁸⁵

69. Regarding education:

- a. An estimated 12,327 DACA recipients in the State of North Carolina are currently in school⁸⁶;
- b. Among those currently in school, an estimated 11,538 have “pursued educational opportunities that I previously could not” because of DACA⁸⁷; and
- c. An estimated 8,814 DACA recipients in the State of North Carolina are currently pursuing a bachelor’s degree or higher.⁸⁸

70. Regarding American citizen family members:

- a. An estimated 19,960 DACA recipients in the State of North Carolina have an American citizen sibling, spouse, or child.⁸⁹

DACA Recipients in the State of Oregon

71. As of June 30, 2017, there were 11,321 initial DACA approvals in the State of Oregon.⁹⁰

72. Regarding employment and earnings:

- a. An estimated 10,347 DACA recipients in the State of Oregon are currently

⁸⁵ 25,094 multiplied by \$36,231.91. This translates into \$61.7 million annually in Social Security contributions (6.2% per FICA) and \$14.4 million annually in Medicare contributions (1.45% per FICA).

⁸⁶ 44.9% of 27,455.

⁸⁷ 93.6 % of 12,327.

⁸⁸ 71.5% of 12,327.

⁸⁹ 72.7% of 27,455.

⁹⁰

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

employed⁹¹;

b. An estimated 611 DACA recipients in the State of Oregon are business owners⁹²; and

c. The State of Oregon’s DACA recipients earn an estimated \$410.2 million annually.⁹³

73. Regarding education:

a. An estimated 5,083 DACA recipients in the State of Oregon are currently in school⁹⁴;

b. Among those currently in school, an estimated 4,758 have “pursued educational opportunities that I previously could not” because of DACA⁹⁵; and

c. An estimated 3,634 DACA recipients in the State of Oregon are currently pursuing a bachelor’s degree or higher.⁹⁶

74. Regarding American citizen family members:

a. An estimated 8,230 DACA recipients in the State of Oregon have an American citizen sibling, spouse, or child.⁹⁷

DACA Recipients in the State of Pennsylvania

75. As of June 30, 2017, there were 5,982 initial DACA approvals in the State of

⁹¹ 91.4% of 11,321.

⁹² 5.4% of 11,321.

⁹³ 10,347 multiplied by \$36,231.91. This translates into \$25.4 million annually in Social Security contributions (6.2% per FICA) and \$5.9 million annually in Medicare contributions (1.45% per FICA).

⁹⁴ 44.9% of 11,321.

⁹⁵ 93.6 % of 5,083.

⁹⁶ 71.5% of 5,083.

⁹⁷ 72.7% of 11,321.

Pennsylvania.⁹⁸

76. Regarding employment and earnings:

- a. An estimated 5,468 DACA recipients in the State of Pennsylvania are currently employed⁹⁹;
- b. An estimated 323 DACA recipients in the State of Pennsylvania are business owners¹⁰⁰; and
- c. The State of Pennsylvania's DACA recipients earn an estimated \$216.7 million annually.¹⁰¹

77. Regarding education:

- a. An estimated 2,686 DACA recipients in the State of Pennsylvania are currently in school¹⁰²;
- b. Among those currently in school, an estimated 2,514 have "pursued educational opportunities that I previously could not" because of DACA¹⁰³; and
- c. An estimated 1,920 DACA recipients in the State of Pennsylvania are currently pursuing a bachelor's degree or higher.¹⁰⁴

78. Regarding American citizen family members:

- a. An estimated 4,349 DACA recipients in the State of Pennsylvania have an

⁹⁸

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

⁹⁹ 91.4% of 5,982.

¹⁰⁰ 5.4% of 5,982.

¹⁰¹ 5,468 multiplied by \$36,231.91. This translates into \$13.4 million annually in Social Security contributions (6.2% per FICA) and \$3.1 million annually in Medicare contributions (1.45% per FICA).

¹⁰² 44.9% of 5,982.

¹⁰³ 93.6 % of 2,686.

¹⁰⁴ 71.5% of 2,686.

American citizen sibling, spouse, or child.¹⁰⁵

DACA Recipients in the State of Rhode Island

79. As of June 30, 2017, there were 1,248 initial DACA approvals in the State of Rhode Island.¹⁰⁶

80. Regarding employment and earnings:

- a. An estimated 1,141 DACA recipients in the State of Rhode Island are currently employed¹⁰⁷; and
- b. The State of Rhode Island's DACA recipients earn an estimated \$45.2 million annually.¹⁰⁸

81. Regarding education:

- a. An estimated 560 DACA recipients in the State of Rhode Island are currently in school¹⁰⁹;
- b. Among those currently in school, an estimated 524 have "pursued educational opportunities that I previously could not" because of DACA¹¹⁰; and
- c. An estimated 401 DACA recipients in the State of Rhode Island are currently pursuing a bachelor's degree or higher.¹¹¹

¹⁰⁵ 72.7% of 5,982.

¹⁰⁶ As a common rule, smaller sample sizes lead to greater uncertainty around estimates. https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

¹⁰⁷ 91.4% of 1,248.

¹⁰⁸ 1,141 multiplied by \$36,231.91. This translates into \$2.8 million annually in Social Security contributions (6.2% per FICA) and \$0.7 million annually in Medicare contributions (1.45% per FICA).

¹⁰⁹ 44.9% of 1,248.

¹¹⁰ 93.6 % of 560.

¹¹¹ 71.5% of 560.

82. Regarding American citizen family members:

- a. An estimated 907 DACA recipients in the State of Rhode Island have an American citizen sibling, spouse, or child.¹¹²

DACA Recipients in the State of Virginia

83. As of June 30, 2017, there were 12,248 initial DACA approvals in the State of Virginia.¹¹³

84. Regarding employment and earnings:

- a. An estimated 11,195 DACA recipients in the State of Virginia are currently employed¹¹⁴;
- b. An estimated 661 DACA recipients in the State of Virginia are business owners¹¹⁵; and
- c. The State of Virginia’s DACA recipients earn an estimated \$443.8 million annually.¹¹⁶

85. Regarding education:

- a. An estimated 5,499 DACA recipients in the State of Virginia are currently in school¹¹⁷;
- b. Among those currently in school, an estimated 5,147 have “pursued educational

¹¹² 72.7% of 1,248.

¹¹³

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

¹¹⁴ 91.4% of 12,248.

¹¹⁵ 5.4% of 12,248.

¹¹⁶ 11,195 multiplied by \$36,231.91. This translates into \$27.5 million annually in Social Security contributions (6.2% per FICA) and \$6.4 million annually in Medicare contributions (1.45% per FICA).

¹¹⁷ 44.9% of 12,248.

opportunities that I previously could not” because of DACA¹¹⁸; and

- c. An estimated 3,932 DACA recipients in the State of Virginia are currently pursuing a bachelor’s degree or higher.¹¹⁹

86. Regarding American citizen family members:

- a. An estimated 8,904 DACA recipients in the State of Virginia have an American citizen sibling, spouse, or child.¹²⁰

DACA Recipients in the State of Washington

87. As of June 30, 2017, there were 17,937 initial DACA approvals in the State of Washington.¹²¹

88. Regarding employment and earnings:

- a. An estimated 16,394 DACA recipients in the State of Washington are currently employed¹²²;
- b. An estimated 969 DACA recipients in the State of Washington are business owners¹²³; and
- c. The State of Washington’s DACA recipients earn an estimated \$649.9 million annually.¹²⁴

¹¹⁸ 93.6 % of 5,499.

¹¹⁹ 71.5% of 5,499.

¹²⁰ 72.7% of 12,248.

¹²¹

https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf

¹²² 91.4% of 17,937.

¹²³ 5.4% of 17,937.

¹²⁴ 16,394 multiplied by \$36,231.91. This translates into \$40.3 million annually in Social Security contributions (6.2% per FICA) and \$9.4 million annually in Medicare contributions (1.45% per FICA).

89. Regarding education:

- a. An estimated 8,054 DACA recipients in the State of Washington are currently in school¹²⁵;
- b. Among those currently in school, an estimated 7,538 have “pursued educational opportunities that I previously could not” because of DACA¹²⁶; and
- c. An estimated 5,758 DACA recipients in the State of Washington are currently pursuing a bachelor’s degree or higher.¹²⁷

90. Regarding American citizen family members:

- a. An estimated 13,040 DACA recipients in the State of Washington have an American citizen sibling, spouse, or child.¹²⁸

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of our knowledge.

Respectfully submitted,



Dr. Tom K. Wong

September 27, 2017

Date

¹²⁵ 44.9% of 17,937.

¹²⁶ 93.6 % of 8,054.

¹²⁷ 71.5% of 8,054.

¹²⁸ 72.7% of 17,937.